Quentin H. Davis, P.E.
Hans A. Anderson, P.E.
R. Todd Weegens, P.E.
Mick W. Gronewold, P.E.
Ken R. Thompson

660 W. Stephenson St.
Freeport, Illinois 61032
815/235-7643
FAX 815/235-4632

FEHR-GRAHAM
& ASSOCIATES
Engineering and Science
Consultants

March 28, 2002

Metropolitan Water Reclamation District of Greater Chicago
Industrial Waste Enforcement –Pretreatment Section
Post Office Box 10654
Chicago, IL 60610-0654

Re: Spill Prevention Control and Countermeasure Plan – March 2002 Update
Belmont Plating Works, Inc.
9145 King Street
Franklin Park, IL 60131

Dear Sir/Madam:

Enclosed please find a copy of the updated pages for the above referenced document. These changes were made pursuant to a site visit conducted by Ron Rogowski and James Schaefer on March 21, 2002. If you require any additional information, please do not hesitate to contact either Mr. Ken Thompson or myself.

Respectfully submitted,

Daniel M. Stoehr
Environmental Scientist

DMS:dj
I:\Documents\SEC 2002\42146\D42146a-MWRD.doc
Enclosure

cc: Mark Toni, Belmont Plating (W/ Enclosure)

TABLE OF CONTENTS

EXHIBITS

I. GENERAL INFORMATION

A. LOCATION

Office	Plant
Belmont Plating Works, Inc.	Belmont Plating Works, Inc.
9145 King Street	3410 North River Road
Franklin Park, IL 60131	Franklin Park, IL 60131
847/678-0200	847/678-0200

B. EMERGENCY CONTACT PERSONNEL

1. Primary Emergency Coordinator
   a. Name: David Toni
   b. Title: Vice President
   c. Work Phone: 847/678-0200
   d. 24 Hour Emergency Phone: 847/698-9886

2. Alternate Emergency Coordinator
   a. Name: Mark Toni
   b. Title: President
   c. Work Phone: 847/678-0200
   d. 24 Hour Emergency Phone: 847/692-9398

C. DESCRIPTION OF BUSINESS

1. SIC Code: 3471
2. Categorical Pretreatment Standard: 40 CFR 413 & 40 CFR 433
3. Shifts: 2 Shifts, 24 hours/day, 6 days/week
4. Number of employees: 80-120
5. Description of Operations: Job Shop Electroplater
6. Pretreatment Practices: Please see Exhibits 1 & 2

   Three types of wastewater are treated. Wastewater containing neither cyanide nor chromium is 1) pH adjusted for metal precipitation and 2) filtered. Wastewater containing cyanide and metals is 1) treated by alkaline chlorination to destroy the cyanide, 2) pH adjusted to allow for metal hydroxide precipitation and 3) filtered. Wastewater containing hexavalent chromium is 1) treated with sodium metabisulfite to reduce the hexavalent chromium to trivalent chromium, 2) pH adjusted to allow for metal hydroxide precipitation and 3) filtered. All wastewater is pH adjusted prior to discharge to within legal limits.

   All discharges of spent process solutions are first pretreated as necessary and then given final pH adjustment treatment.

D. DISCHARGE PRACTICES

1. Average Daily Discharge: 145,000 Gallons per Day avg.
   165,000 Gallons per Day max.

2. Belmont Plating Works, Inc. currently plates copper, nickel, chrome, zinc, brass, cadmium and tin. Chemical Constituents of Discharge are pretreated to meet Electroplating Standards 40 CFR 413.

3. Nature of Discharge: The rinse water discharge is continuous, with some pretreatment of spent concentrated solutions, cleaners and acids.

II. PLANT LAYOUT/FLOW DIAGRAMS

A. GENERAL PLANT LAYOUT

Please see Exhibit 3.

B. FLOW DIAGRAM

Please see Exhibit 3 for:

1. Identification and location of floor drains, pipes and channels in the process area and their direction of flow.

2. The location of the final wastewater discharge point is shown on the drawing.

3. Direction of flow for all sanitary sewers is shown on the drawing.

4. Above-ground run-off from the following areas does not exist: East building wet process floor area is capable of holding 3,600 gallons per inch of containment. The west building has 7,500 gallons of containment per inch. Thus at a 2 inch height the containment is well in excess of the largest process tank.

   a. Chemical storage areas - see drawing
   b. Pretreatment facilities - see drawing
   c. Waste-handling area - see drawing

III. MATERIAL INVENTORY

A. DESCRIPTION AND LOCATION OF STORED CHEMICALS

Liquid sodium hydroxide, sodium hypochlorite and technical grade hydrochloric acid are stored in bulk containers. See Exhibit 3 for exact locations. All other chemical storage is in 55-gallon containers or smaller. Storage areas are indicated on Exhibit 3.

B. MAXIMUM QUANTITY OF STORED CHEMICALS

The capacity of the sodium hypochlorite bulk storage tank is 1,500 gallons. The hydrochloric acid tank's capacity is 5,000 gallons. Liquid sodium hydroxide is stored in a 5,000-gallon tank. All other chemicals are contained in 55-gallon drums or smaller.

Solid waste, classified F006, is stored in an area in the process room where there are no floor drains. F006 waste accumulates in a roll off. F006 waste is never accumulated in excess of 90 days.

C. DESCRIPTION OF STORAGE CONTAINERS

The bulk storage containers for sodium hypochlorite and hydrochloric acid are properly diked to contain any spills. The secondary containments for the Hydrochloric Acid and Sodium Hypochlorite bulk storage are capable of handling 5,200 gallons and 1,610 gallons respectively. The sodium hydroxide bulk tank has a spill containment pan that holds 1,300 gallons with overflow directed to the wastewater pretreatment sump pits.

D. CHEMICAL COMPATIBILITY OF STORED MATERIAL

All stored materials are properly contained and separated.

IV. SPILL AND LEAK PREVENTION

A. EQUIPMENT TO PREVENT OR DETECT SPILLS

Each process area is curbed to provide retention equal to or greater than the largest process tank in the area. All secondary containment areas are provided with impervious flooring with no direct drainage to the sewer system. There is only one process water discharge point. It is located at the Wastewater Pre-Treatment System. This discharge point is designed so that all water leaving the process area must first pass through the pre-treatment system.

B. SPILL CONTAINMENT EQUIPMENT

Please see A above. This will contain the spill. Automatic and manual pumps will be used to transfer the material to the proper pretreatment step.

C. PREVENTATIVE MAINTENANCE PROCEDURES

ORP and pH instruments are standardized every week. Pumps and mixers are subject to daily visual inspection.

D. INVENTORY OF PRETREATMENT SYSTEM SPARE PARTS

Chemical feed pump	pH Probe
Chemical feed pump diaphragms	ORP Probe
Salt bridges	Mixer
Ball check valves	

E. Process flow diagrams detailing Belmont's procedures in the event of specific emergencies can be found in Exhibit 4 of this Plan.

V. EMERGENCY RESPONSE EQUIPMENT AND PROCEDURES

A. EQUIPMENT

The plant has the following equipment:

Fire Extinguishers
Dust/Mist Masks
First Aid Kit
Rubber Boots
Rubber Gloves
Safety Glasses
Absorbent Material
Portable Pumps

B. EMERGENCY RESPONSE PROCEDURES:

All employees are aware of the following:

1. Whoever discovers a spill or any incident that can potentially affect the wastewater discharge shall immediately notify the primary response coordinator. Incidents/spills include but are not limited to: loss of electrical power in any part of the facility, spill of any chemicals stored on site in bulk, and other natural or man-made disaster.

David Toni	Work No.	847/678-0200
	Home No.	847/698-9886

2. If the primary coordinator is not available, the alternate shall be:

Mark Toni	Work No.	847/678-0200
	Home No.	847/692-9398

3. All emergency response agencies are listed on a single sheet (see page 8) and posted at the Right To Know stations.

   These Agencies and their phone numbers are also listed on page 6, item VI of the Plan.

4. Immediately after notifying the response coordinator:

   a. The incoming water shall be shut off if necessary so as to not exceed the containment volume capacity.

   b. An assessment of the nature of the spill or incident shall be made. Consideration shall be volume, concentration, material spilled, and/or potential effect of spill/incident on wastewater discharge.

   c. Discharge to the District from the waste water pretreatment system will be stopped to prevent an accidental discharge from reaching the sewer.

   d. As noted in IV A, the only discharge point to the sewer at the facility is located at the wastewater pre-treatment system and is designed so that all water or chemicals leaving the process area must first pass through the pre-treatment system. All other spills will be contained on-site using spill control equipment to prevent accidental discharge to the sewer.

5. Site Remediation Activities shall be:

   a. Under most circumstances all spills or wastewater accumulated as a result of an incident will be pretreated on site using in-house pretreatment equipment. It will be necessary to pretreat some spills before they are directed to the proper flow through reaction tank. Caustic and acid spills will be neutralized and directed to the proper reactors for treatment. Spills containing cyanide will either be directed to the flow-through cyanide reactor or will first be pretreated and then directed to the cyanide reactors. If the spill contains chrome it will be directed toward the proper flow-through reactor or pretreated and then directed to the proper reactor.

   b. Under extreme conditions treatment by an outside party may be necessary. Due to the nature and design of the plant this is highly unlikely. However should this be necessary, the response coordinator is authorized to commit the total financial resources of the company. He would call:

      1) Fehr-Graham & Associates 815/235-7643
         Environmental Consultants

      2) SET Environmental 877/437-7455 x555
         24 Hour Emergency Spill Response

VI. SPILL REPORTING PROCEDURES

As stated above, employees shall advise the emergency response coordinator. The emergency response coordinator will initiate remedial action, including advising the proper authorities. These will include:

Ambulance	911
Franklin Park Fire Department	911
Franklin Park Police Department	911
Metropolitan Water Reclamation District	312/751-3044
Metropolitan Water Reclamation District (PM)	312/787-3575
IL Emergency Management Agency (IEMA)	1-800/782-7860
National Response Center	1-800/424-8802
Federal EPCRA Hotline	1-800/535-0202

If a spill should ever discharge into the sewer system, the MWRD will be notified by telephone immediately with information on the quantity and nature of the material spilled as well as the time and duration of the spill. The caller shall be prepared to advise MWRD as to what immediate actions have been taken to rectify the situation.

Written notification must then be received by the MWRD within five (5) days of the start of the event. The form RD-116, Pretreatment System Malfunction, Slug Discharge, Bypass, or Accidental Spill Notification Report, will be completed. The report will describe the event, its cause and what measures have been taken to prevent reoccurrence.

VII. EMPLOYEE TRAINING PROGRAM

A. All employees, when first hired, are shown all of the process areas and solutions. The natures of the acids, alkalies and cyanides and their potential danger especially with respect to eye and skin contact, is thoroughly explained. Throughout their employment the supervisor reiterates these points.

Belmont Plating Works, Inc. maintains a Storm Water Pollution Prevention Plan (SWPPP) and Hazardous Waste Contingency Plan pursuant to applicable regulations. Employee training for these Plans includes: spill prevention and response, good housekeeping, Best Management Practices, hazardous waste handling practices, etc.

B. Appropriate employees receive updated training as indicated in Item VII A above on an annual basis.

C. Records of the training documented in VII A and B above are maintained on site.

D. Dates of applicable training are as follows:

- Stormwater Pollution prevention Plan Training with Annual Update
  July, 18, 2001

- Hazardous Waste Contingency Plan Training with Annual Update
  - Material Handlers April 26, 2001
  - Emergency Coordinators May 3, 2001

- Spill Prevention Control & Countermeasure Training with Annual Update
  November 5, 2001

TO BE POSTED AT RIGHT-TO-KNOW STATIONS

Franklin Park Fire Department	911
Franklin Park Police Department	911
Ambulance	911
Metropolitan Water Reclamation District	312/751-3044
Metropolitan Water Reclamation District (PM)	312/787-3575
IEMA	1 800/782-7860
National Response Center	1 800/424-8802
Federal EPCRA Hotline	1 800/535-0202

Whoever discovers a spill or an incident that can potentially affect the wastewater discharge shall immediately notify the primary response coordinator. Incidents/spills include but are not limited to: loss of electrical power, spill of any chemicals stored on site in bulk, and other natural or man-made disasters.

Name:	David Toni
Title:	Vice President
Work Phone:	847/678-0200
24 Hour Emergency Phone:	847/698-9886

If the primary coordinator is not available, the alternate shall be:

Name:	Mark Toni
Title:	President
Work Phone:	847/678-0200
24 Hour Emergency Phone:	847/692-9398

Immediately after notifying the response coordinator:

1. The incoming water shall be shut off so as to not exceed the containment volume capacity.

2. An assessment of the nature of the spill or incident shall be made. Consideration shall be volume, concentration, material spilled, and/or potential effect of incident on wastewater discharge.

3. The response coordinator will initiate remedial action including notifying the proper authorities.

VIII. CERTIFICATION

A. Professional Engineer's Certification

I hereby certify that this Spill Prevention Control and Countermeasure Plan was prepared under my direct supervision and in accordance with good engineering practices. The facility has been examined and I find this Plan and containment facilities to be in accordance with all applicable Federal, State, County, and Municipal regulations. This certification shall in no way relieve the owner or operator of this facility of his or her duty to prepare and fully implement such Plan. I am a duly Registered Professional Engineer under the laws of the State of Illinois. My seal and registration number appear below.

Date: February 20, 2002

Signature: R Todd Weegens PE

Name: R. Todd Weegens

Title: 062-044672

SEAL

B. Management Approval

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. The procedures documented in the Plan have been implemented.

Date: 02/25/02

Signature:

Name: Mark Toni

Title: President

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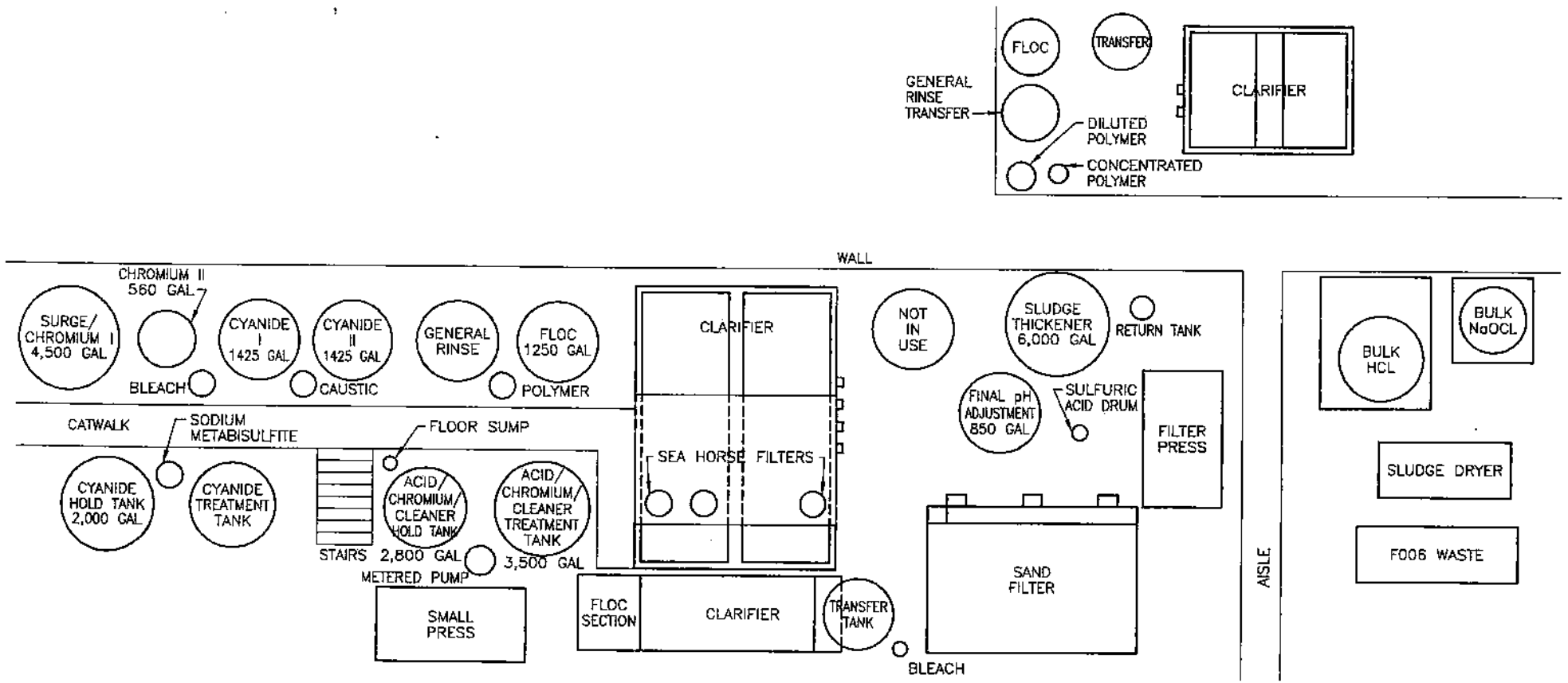
Belmont Plating Works, Inc.
Spill Prevention Control & Countermeasure Plan

Control List

Copy #	Name	Organization	Address	Comments
1	David Toni	Belmont Plating Works, Inc.	9145 King St. Franklin Park, IL 60131	
2	Mark Toni	Belmont Plating Works, Inc.	9145 King St. Franklin Park, IL 60131	
3	N/A	Belmont Plating Works, Inc.	9145 King St. Franklin Park, IL 60131	EMS Binder
4	N/A	Fehr-Graham	660 W. Stephenson St. Freeport, IL 61032	EMS Binder
5	Chris Nowotarski	Stone, Pogrund & Karey	221 N. LaSalle St. 32nd Floor Chicago, IL 60601	Belmont Attorney
6	N/A	MWRD – Industrial Waste Enforcement – Pretreatment Section	P.O. Box 10654 Chicago, IL 60610-0654	
7	Carlos Estrada	Belmont Plating Works, Inc.	9145 King St. Franklin Park, IL 60131	WWT Supervisor
8	Ken Thompson	Fehr-Graham	660 W. Stephenson St. Freeport, IL 61032	Environmental Consultant – Project Manager



ON-SITE WASTEWATER TREATMENT SITE PLAN BELMONT PLATING WORKS 3410 N. RIVER ROAD

10/22/01

SCALE: NOT TO SCALE

FEHR-GRAHAM & ASSOCIATES
ENGINEERING AND SCIENCE CONSULTANTS
660 W. STEPHENSON ST. FREEPORT, IL 61032-5098 815/235-7643
1920 DAIMLER RD. ROCKFORD, IL 61112-1008 815/394-4700
410 MAIN STREET SAVANNA, IL 61074 815/273-7400

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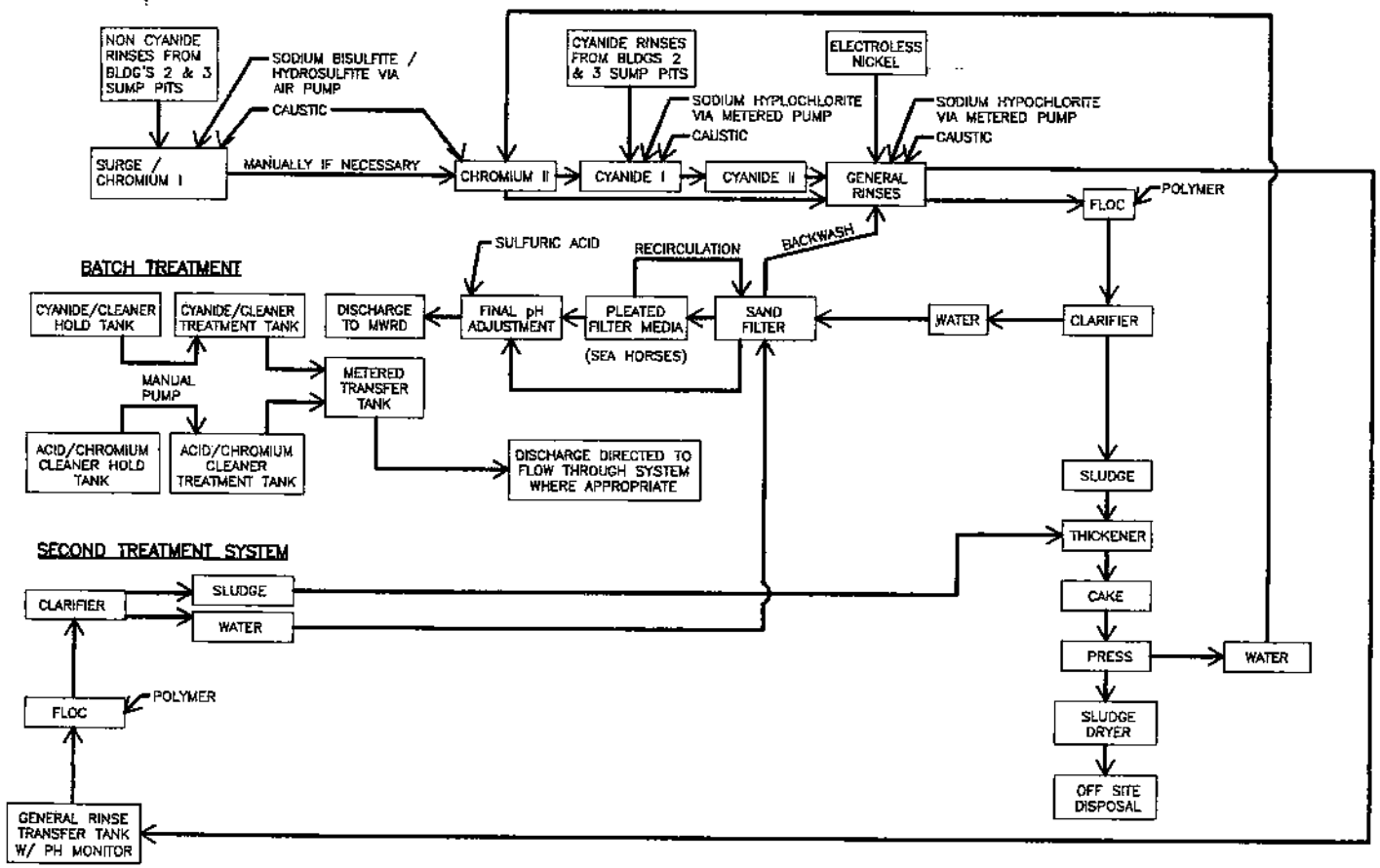


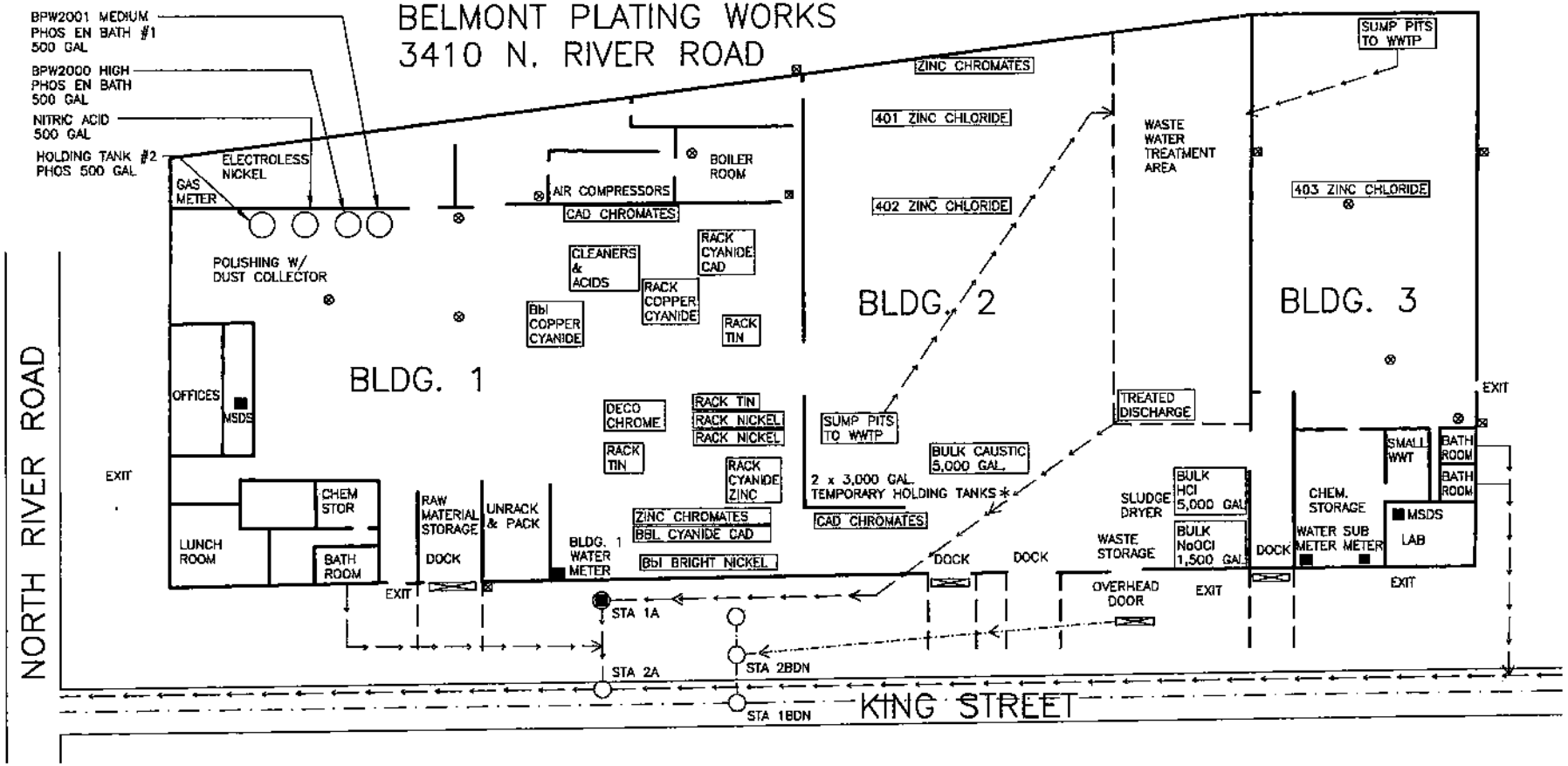
ON-SITE WASTEWATER TREATMENT PROCESS FLOW DIAGRAM BELMONT PLATING WORKS 3410 N. RIVER ROAD

06/26/00

SCALE: NOT TO SCALE

LAND\00\40122\DWG\DIAGRAM

FEHR-GRAHAM & ASSOCIATES
ENGINEERING AND SCIENCE CONSULTANTS
560 W. STEPHENSON ST. FREEPORT, IL 61032-5098 815/235-7643
1920 DAIMLER RD. ROCKFORD, IL 61112-1008 815/394-4700
410 MAIN STREET SAVANNA, IL 61074 815/273-7400



LEGEND

⊗ = FLOOR DRAIN TO ON-SITE W.W.T.

⊠ = ROOF DRAIN. STORMWATER ONLY

= STORM SEWER

= SANITARY/ PROCESS WASTE SEWER

= SEALED STORMWATER DRAIN

* THESE TANKS ARE USED FOR THE TEMPORARY STORAGE OF PLATING CHEMICALS.

BULK HCl CONTAINMENT VOLUME = 5,200 GALS.

BULK NaOCl CONTAINMENT VOLUME = 1,610 GALS.

BULK CAUSTIC CONTAINMENT VOLUME = 1,300 GALS. (WITH OVERFLOW TO W.W.T.P. SUMP PITS)

S E W N

SCALE: NOT TO SCALE

FACILITY SITE PLAN
BELMONT PLATING WORKS
3410 N. RIVER ROAD

02/27/02

EGLPT\02\42146\42146BELMONTPLAN3

FEHR-GRAHAM & ASSOCIATES
ENGINEERING AND SCIENCE CONSULTANTS
660 W. STEPHENSON ST. FREEPORT, IL 61032-5098 815/235-7643
1920 DAIMLER RD. ROCKFORD, IL 61112-1008 815/394-4700
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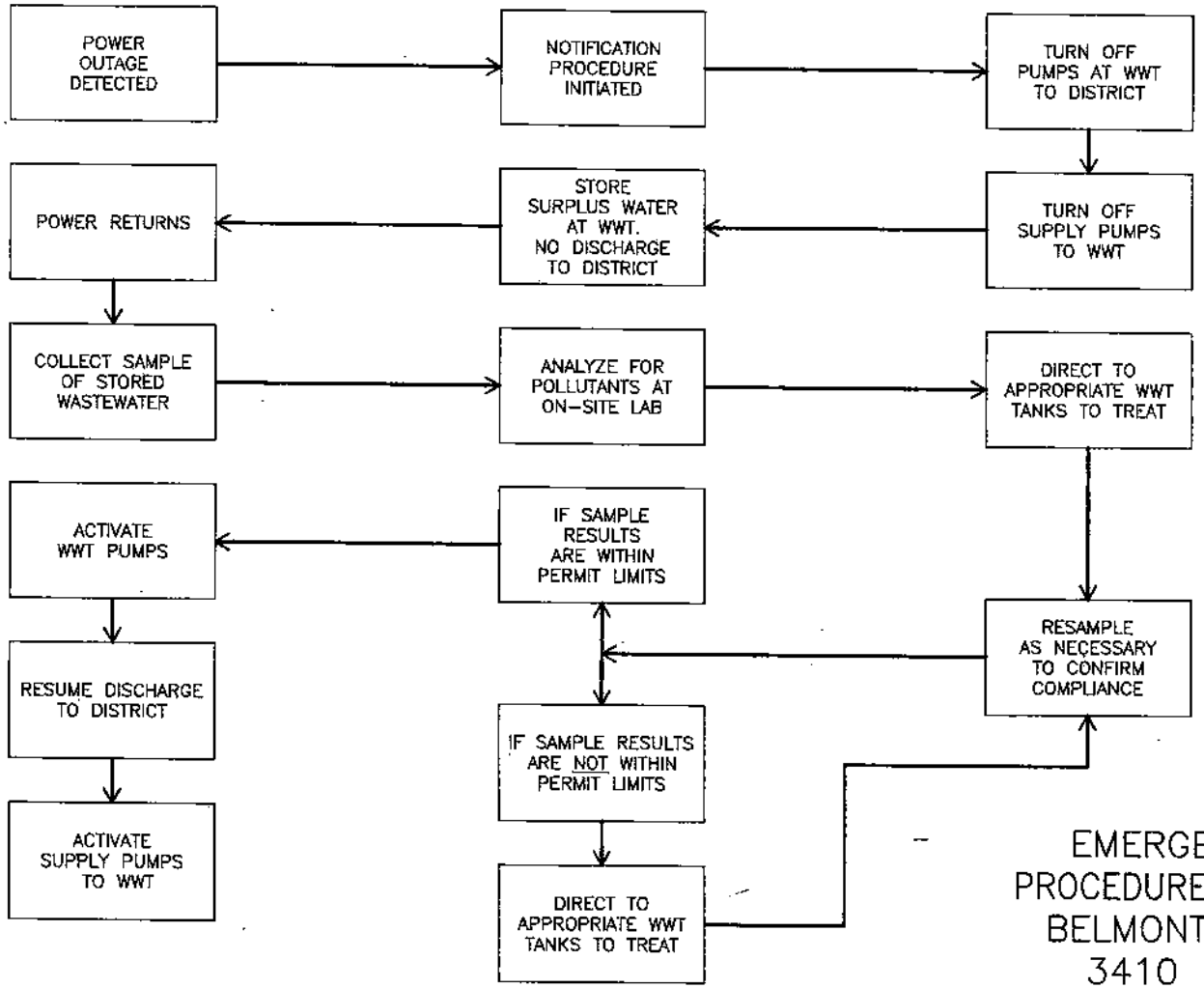

EMERGENCY RESPONSE PROCEDURES – POWER OUTAGE BELMONT PLATING WORKS 3410 N. RIVER ROAD

12/07/01

FEHR–GRAHAM & ASSOCIATES
ENGINEERING AND SCIENCE CONSULTANTS
660 W. STEPHENSON ST. FREEPORT, IL 61032–5098 815/235–7643
1920 DAIMLER RD. ROCKFORD, IL 61112–1008 815/394–4700
410 MAIN STREET SAVANNA, IL 61074 815/273–7400

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